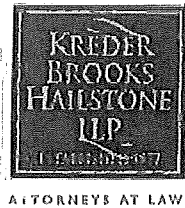


## **Exhibit E**



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220 Penn Avenue  
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Scranton, PA 18501  
570 346 7922  
Fax: 570 346 3715  
E-Mail: kbh@kbh-law.com  
www.kbh-law.com

August 13, 2020

VIA E-MAIL ONLY

Gerard M. Karam, Esquire  
Mazzoni, Karam, Petorak & Valvano  
321 Spruce Street, Ste 201  
Scranton, PA 18503

DAVID K. BROWN  
JENNIFER A. BROWN, L.L.M.  
RICHARD G. REED  
A. JAMES HAILSTONE  
DANA M. ZLOTUCHA

RE: STOUT V. SUSQUEHANNA COUNTY

Dear Jerry:

Of Counsel  
ANDREW HAILSTONE  
LUCILLE MARSH  
MICHAEL J. DONOHUE

I am in receipt of your August 12, 2020 email regarding scheduling depositions including the former Susquehanna County Solicitor, Mike Giangrieco. Susquehanna County does not waive attorney-client privilege regarding any advice, thoughts, comments or counsel provided by Attorney Giangrieco to the Commissioners, or any County employee, while Attorney Giangrieco was County Solicitor.

CODY H. BROOKS  
RETIRED  
JOSEPH C. KREDER  
(1953-2005)

More specifically, neither Commissioner Hall nor Commissioner Arnold will waive attorney-client privilege during the proposed depositions. To avoid the expense of holding the depositions in light of the privilege, I suggest you provide, in writing, the specific areas of inquiry which you seek to address and we can determine whether they would violate attorney-client privilege.

Thank you in advance.

Very truly yours,

KREDER BROOKS HAILSTONE LLP

71-11  
A. James Hailstone

cc: Susquehanna County  
County Commissioners Association